

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **19-35116**
)
DONALD C. NORTON,) **Chapter 13**
)
Debtor(s).) **Hon. Judge: BAER**

NOTICE OF MOTION

To the following persons or entities who have been served via electronic mail:
U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov
Glenn Stearns, Chapter 13 Trustee: peterson_p@lisle13.com

To the following persons or entities who have been served via U.S. Mail:
See attached list.

PLEASE TAKE NOTICE that on **August 7, 2020** I will appear before the **Honorable Judge Baer**, or any judge sitting in that judge's place, and present the **Debtor's Motion to Incur Debt**, a copy of which is attached.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.CourtSolutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
847-520-8100/mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I, Michael R. Colter, II, declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on July 24, 2020, before 5:00 p.m.

To the following persons or entities who have been served via U.S. Mail:

Donald Norton
2160 Magenta Lane
Algonquin, IL 60102

First Midwest Bank N.A.
300 Hunt Club Rd
Gurnee, IL 60031

Freedom Plus
1875 South Grant Street
San Mateo, CA 94402

Toyota Lease Trust
c/o Toyota Motor Credit Corporation
PO Box 9031
Addison, Texas 75001

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank, N.A.
C/O Robertson, Anschutz & Schneid, P.L.
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487

Portfolio Recovery Associates, LLC
C/O Capital One Bank (USA), N.A.
P.O. Box 41067
Norfolk, VA 23541

LVNV Funding, LLC
Resurgent Capitol Services
PO Box 10587
Greenville, SC 29603-0587

Pennymac Loan Services
Po Box 514387
Los Angeles, CA 90051

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:)	Chapter 13
)	
DONALD C. NORTON,)	Case No.: 19-35116
)	
Debtor.)	Hon. Judge Baer

MOTION TO INCUR DEBT

NOW COMES the Debtor, **DONALD NORTON**, by and through their attorneys, **DAVID M. SIEGEL & ASSOC., LLC**, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois Eastern Division.
- 2) On December 13, 2019, Debtor filed a voluntary petition for relief pursuant to Chapter 13 of Title 11 USC and Glenn Stearns was appointed Trustee in the case.
- 3) Debtor's Plan will pay the general unsecured creditors 100% of their allowed claims.
- 4) Debtor received financing for a loan of \$26,152.00, with an interest rate of 17.99% and a monthly payment of \$601.00 (Exhibit A).
- 5) Debtor seeks permission to purchase a 2020 Jeep Cherokee North 4x4 with the above terms of financing. Debtor can afford this expense based on his amended schedules I and J (Exhibit B).
- 6) Debtor received two other offers to purchase vehicles but each had higher monthly payments.
- 7) If this Court approves Debtor's motion to incur, Debtor will surrender his leased Lexus that has a monthly payment of \$939.00. This will result in a savings of \$338.00 per month for the Debtor. Debtor is willing to pay that extra amount toward his plan.

WHEREFORE, the Debtor, **DONALD NORTON**, pray that this Honorable Court enter an Order to Incur Debt and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II
Michael R. Colter, II, A.R.D.C. #6304675
Attorney for the Debtor